

**TERMINIX INTERNATIONAL COMPANY, L.P.'S OBJECTIONS AND RESPONSES  
TO EPA'S APRIL 10, 2015 REQUEST TO PROVIDE INFORMATION**

Terminix International Company, L.P. hereby submits its Objections and Responses to the U.S. Environmental Protection Agency's ("EPA's") April 10, 2015 request for information ("Information Request"). Terminix International Company, L.P. is an indirect wholly owned subsidiary of ServiceMaster Global Holdings, Inc. Terminix International Company, L.P. specializes in protection against termite damage, rodents, insects and other pests, including cockroaches, spiders, wood-destroying ants, ticks, fleas, and bed bugs, with services including termite remediation, annual termite inspection and prevention treatments with damage claim guarantees, periodic pest control services, and insulation services. The Terminix national branch structure includes approximately 285 company-owned locations and approximately 25 franchise agreements, which serve approximately 2.8 million customers in 47 states and the District of Columbia. Terminix also provides termite and pest control services through subsidiaries in Canada, Mexico, the Caribbean and Central America, as well as a joint venture in India. Services in the US Virgin Islands are provided by Terminix International USVI, LLC. Additional information concerning these entities is available in the Form 10-K filed with the SEC. Terminix International Company, L.P. has made a good faith inquiry of, and is providing these Responses and Objections on behalf of, its parents, subsidiaries, and related entities identified in TMXPR-00001 to TMXPR-00008, enclosed with these Objections and Responses. "Prestige Pest Management Corporation" (also known as Prestige Pest Management, Inc.) is an independently-owned sub-licensee that is not owned or operated by Terminix International Company, L.P., and therefore these Objections and Responses are not submitted on behalf of that entity.

**Terminix International Company, L.P.'s Objections**

Terminix International Company, L.P. objects to the Information Request to the extent it seeks to compel Terminix International Company, L.P. to respond on behalf of any entity other than itself. Specifically, Terminix International Company, L.P. objects to Definition 1 of Appendix A to the Information Request to the extent it includes "Prestige Pest Management Corporation" in the definition of "Terminix," "You," and "Your." Terminix International Company, L.P. further objects to Definition 1 as it states that "[a]ll questions apply to Terminix company-owned locations and to those owned or managed by licensees, franchisees, or subsidiaries." Prestige Pest Management Corporation is an independently-owned sub-licensee that is not owned or operated by Terminix International Company, L.P. Therefore, this response is not provided on behalf of Prestige Pest Management Corporation, which may have responsive information. Subject to and without waiving this objection, Terminix International Company, L.P. has made a good faith inquiry of, and is providing these Responses and Objections information on behalf of, its parents, subsidiaries, and related entities identified in TMXPR-00001 to TMXPR-00008.

Terminix International Company, L.P. objects to the definition of "Person" within Definitions 2 and 3 of Appendix A to the extent it purports to obligate Terminix International Company, L.P. to provide information about or held by entities other than itself. Therefore, this response is not provided on behalf of Prestige Pest Management Corporation, which may have responsive information. Subject to and without waiving this objection, Terminix International

Company, L.P. has made a good faith inquiry of, and is providing these Responses and Objections information on behalf of, its parents, subsidiaries, and related entities identified in TMXPR-00001 to TMXPR-00008.

Terminix International Company, L.P. objects to Instruction 4 of Appendix B to the Information Request, requiring Terminix International Company, L.P. to “identify all contributing sources of information” to each response as vague and ambiguous, overly broad, calling for privileged information, and unreasonable.

Terminix International Company, L.P. objects to Instruction 5 of Appendix B, purporting to require the production of all documents in Terminix International Company L.P.’s “possession, custody or control,” even if this includes documents in the possession of third parties, as unduly burdensome and unreasonable.

Terminix International Company, L.P. objects to Instruction 7 of Appendix B, requiring the production of all attachments and enclosures to responsive documents “even if they are not otherwise responsive to this Information Request” as overly broad, burdensome, and unreasonable. Terminix International Company, L.P. does not intend to produce non-responsive documents.

Terminix International Company, L.P. objects to Instruction 8 of Appendix B, purporting to require Terminix International Company, L.P. to supplement its responses to this Information Request with any information that “should later become known or available” into the indefinite future as overly broad, unduly burdensome, and unreasonable.

Terminix International Company, L.P. objects to Instruction 10 of Appendix B, purporting to require a responsible company official to sign and submit the Certification attached as Appendix D to the Information Request as not authorized by any applicable statute or regulation.

Terminix International Company, L.P. objects to the Information Request to the extent that it seeks privileged information, including, but not limited to, documents and other information protected by the attorney-client privilege and/or work product doctrine or any other applicable privilege or immunity.

#### **Terminix International Company, L.P.’s Responses to the Information Request**

Terminix International Company, L.P. incorporates by reference into each Response all of the foregoing objections outlined above as if each objection were restated in full.

1. *Please describe the corporate form and structure of the following entities; the relationships between them; and the role, function, and purpose of each entity within the larger body of entities constituting “Terminix”:*

- a) *Terminix International, Inc.*
- b) *Terminix International Company, L.P.*
- c) *ServiceMaster Consumer Services, L.P.*
- d) *ServiceMaster Global Holdings, Inc.*

- e) The ServiceMaster Company, LLC*
- f) Terminix Commercial*
- g) Terminix Pest Control Systems*
- h) Prestige Pest Management Corp.*
- i) Any other entity under your control or direction whose roles and responsibilities include the purchase, import, receipt, sale, distribution, application, use, storage, or handling, in Puerto Rico, of Methyl Bromide or Methyl Bromide containing pesticides.*

#### **RESPONSE TO REQUEST NO. 1:**

**a) Terminix International, Inc.** is a Delaware corporation having its principal place of business in Tennessee. Terminix International Inc. is the sole general partner for Terminix International Company, L.P. The relationship between Terminix International, Inc., Terminix International Company, L.P., and SMCS Holdco, Inc. is shown at TMXPR 000001. Flow charts illustrating the relationship between Terminix International Inc. and related companies are provided at TMXPR 000002 through TMXPR 000008.

**b) Terminix International Company, L.P.** is a limited partnership and is the operating entity that provides pest control services in the United States, including its territories, and other locations. Terminix International Inc. is the sole general partner and ServiceMaster Consumer Services Limited Partnership is the limited partner. The list of partners in Terminix International Company, L.P. and the relationship between those partners and other entities is shown at TMXPR 000001. Flow charts illustrating the relationship between Terminix International Company, L.P. and related companies are provided at TMXPR 000002 through TMXPR 000008.

**c) ServiceMaster Consumer Services, L.P.** is a limited partnership that has two general partners and two limited partners. The two general partners are SMCS Holdco, Inc. and SMCS Holdco II, Inc. Both are Delaware corporations with their principal places of business in Tennessee. The two limited partners are SMCS Holdco, Inc. and SMCS Holdco II, Inc. Both are Delaware corporations with their principal places of business in Tennessee. SMCS Holdco, Inc. and SMCS Holdco II, Inc. are wholly owned by The ServiceMaster Company, LLC. The relationship between ServiceMaster Consumer Services, L.P., SMCS Holdco, Inc. and SMCS Holdco II, Inc. is shown at TMXPR 000001. Flow charts illustrating the relationship between ServiceMaster Consumer Services, L.P. and related companies are provided at TMXPR 000002 through TMXPR 000008.

**d) ServiceMaster Global Holdings, Inc.** is a publicly traded Delaware corporation (Ticker: SERV) with its principal place of business in Tennessee. Among its directly or indirectly owned subsidiaries are ServiceMaster Company LLC, SMCS Holdco, Inc., SMCS Holdco II, Inc., and Terminix International, Inc. A complete list of ServiceMaster Global Holdings, Inc.'s subsidiaries is shown at TMXPR 000009 through TMXPR 000010. Flow charts illustrating the relationship between ServiceMaster Global Holdings, Inc. and its subsidiaries are provided at TMXPR 000002 through TMXPR 000008.

**e) ServiceMaster Company, LLC** is a Delaware limited liability company with its principal place of business in Tennessee. It is a wholly owned subsidiary of CDRSVM Holding LLC. SMCS Holdco, Inc. and SMCS Holdco II, Inc. are wholly owned subsidiaries of ServiceMaster

Company, LLC. Flow charts illustrating the relationship between ServiceMaster Company, LLC and related companies are provided at TMXPR 000002 through TMXPR 000008.

**f) Terminix Commercial** is a trade name and trademark used by Terminix International Company, L.P. for commercial services. It is not a corporate entity.

**g) Terminix Pest Control Systems** is not used as either a trade name nor a trademark, and is not a corporate entity.

**h) Prestige Pest Management Corp.** is an independent sub-licensee of Terminix in Puerto Rico. It is owned by Mark Kitchenman and operates pursuant to the Sublicense Agreement between International Pest Control, LLC and Prestige Pest Management, Inc. TMXPR 000011 through TMXPR 000054. No Terminix or ServiceMaster entity controls Prestige Pest Management, Inc. and Prestige Pest Management, Inc. is not an agent of any Terminix or ServiceMaster entity.

**i) Any other entities.** Terminix International Company, L.P. does not own or operate any entities that purchases, imports, receives, sells, distributes, applies, uses, stores, or handles methyl bromide or pesticides containing methyl bromide for use in Puerto Rico.

*2.a. Does Terminix have any licensees, franchisees, subsidiaries, branches, divisions, or affiliates in Puerto Rico not identified in question 1, whose roles and responsibilities include the purchase, import, receipt, sale, distribution, application, use, storage, or handling of Methyl Bromide or Methyl Bromide containing pesticides?*

*b. If the answer to 2.a. is yes, identify those entities and their respective addresses, a contact person for each, and describe their corporate or organizational form and the relationship between them and the companies referred to in question 1 above.*

**RESPONSE TO REQUEST NO. 2:** No. Please note that these Responses and Objections are not submitted on behalf of Prestige Pest Management, Inc., and Terminix International Company, L.P. expects that Prestige Pest Management, Inc. will respond on its own behalf.

*3. To the extent not already identified in your responses to questions 1 and 2, please identify all Terminix companies (and any other companies, firms or persons using the Terminix name) operating in the Commonwealth of Puerto Rico. Describe each entity's activities in Puerto Rico, its roles and responsibilities, and its relationship to Terminix.*

**RESPONSE TO REQUEST NO. 3:** None. Please note that these Responses and Objections are not submitted on behalf of Prestige Pest Management, Inc., and Terminix International Company, L.P. expects that Prestige Pest Management, Inc. will respond on its own behalf.

*4. a. Has Terminix distributed or sold any Methyl Bromide or pesticides containing Methyl Bromide to any entity or person in Puerto Rico since January 1, 2013?*

*b. If the answer to question 4.a. is yes, then for each such sale or distribution since January 1, 2013, provide a copy of the sale or distribution records and describe the purpose for which the sale or distribution was made. Include the date of the sale or distribution, the quantity sold or distributed, the party to whom it was sold or distributed, where it was shipped, copies of any certifications received from a purchaser or recipient,*

*and, if a pesticide, a copy of the label or the product's name, EPA registration number, and the producer's EPA establishment number.*

**RESPONSE TO REQUEST NO. 4:** No. Please note that these Responses and Objections are not submitted on behalf of Prestige Pest Management, Inc., and Terminix International Company, L.P. expects that Prestige Pest Management, Inc. will respond on its own behalf.

5. *a. From January 1, 2013 to the present day (i.e., April 10, 2015), please identify all residences, dwellings, work places, public places (e.g., coliseum, stadium, arena) and any other enclosed area, in Puerto Rico, where Terminix used (i.e., applied) pesticides containing Methyl Bromide. Please exclude agricultural uses permitted by the instructions on the product label, and quarantine and pre-shipment applications which were supervised by USDA APHIS.*  
*b. For each location identified in your answer to question 5.a. above, include the complete, specific address of the location (e.g., if an apartment building or other multiple-unit building, then specify the prices apartment or unit).*

**RESPONSE TO REQUEST NO. 5:** None. Terminix International Company, L.P. is aware of press reports that sub-licensee Prestige Pest Management, Inc. may have applied pesticides containing methyl bromide in Puerto Rico. Please note that these Responses and Objections are not submitted on behalf of Prestige Pest Management, Inc., and Terminix International Company, L.P. expects that Prestige Pest Management, Inc. will respond on its own behalf.

6. *For each of the locations and applications of pesticides containing Methyl Bromide which you identified in your answer to question 5, above, please answer the following questions and provide documentation in response to the requests:*
  - a) State the exact date of the application*
  - b) State the name and address of the Terminix entity or office that performed each application. Identify with specificity for which "Terminix" entity the answer is being provided.*
  - c) Identify the distributor and/or supplier from whom Terminix obtained the pesticide applied and provide purchase records, sales receipts or invoices from the distributor and/or supplier.*
  - d) Identify the Terminix employee(s) responsible for deciding which pesticide product to use at each application.*
  - e) Identify all Terminix employee(s) present at each application and each one's role and responsibility with regard to the application.*
  - f) Provide proof of the pesticide applicator's certification(s).*
  - g) Identify the customer(s)/ client(s) who request each of the above-identified applications.*
  - h) Provide a copy of the customer/client request for each application.*

*i) State the purpose of each application (i.e., target pest and commodity, structure or object to be treated).*

*j) Provide the application records and invoices for each application, including but not limited to information on (i) the location, (ii) date, (iii) time, (iv) name of pesticide used, (v) quantity of pesticides applied, (vi) percentage of active ingredient per unit of the pesticide use [sic], (vii) method of application, (viii) application rate, (ix) volume, and (x) restricted entry interval (REI).*

*k) List the pesticide product name, EPA registration number and the producer's EPA establishment number for all pesticides containing Methyl Bromide which were used in each application.*

*l) Provide a copy of the entire label(s) of the pesticide(s) containing Methyl Bromide that was used in each application.*

*m) Was anyone other than the applicator at the location at the time of application or soon thereafter? If so, provide the name(s) and contact information for each such person.*

*n) Identify any accidents, incidents, injuries or customer complaints resulting from the use of a pesticide containing Methyl Bromide during or after an application.*

*o) For each application, describe any procedures followed other than the directions and requirements on the product label.*

*p) For any applications of a Q product, provide documents of supervision by an appropriate regulatory or supervisory agent at the time of the application.*

**RESPONSE TO REQUEST NO. 6:** Not applicable. See Response to Request No. 5.

7. *During the past three years, to what extent did Terminix comply with the recordkeeping and reporting requirements of 40 CFR Section 82.13(z)(1) and (2), with respect to the Methyl Bromide purchased or received for application in Puerto Rico?*

**RESPONSE TO REQUEST NO. 7:** This question is not applicable to Terminix International Company, L.P. because it did not either purchase methyl bromide for application in Puerto Rico or receive methyl bromide for application in Puerto Rico during the last three years. See also Responses to Request No. 2-6. Terminix International Company, L.P. is aware of purchases of methyl bromide made by a branch in the U.S. Virgin Islands, which is owned by Terminix International USVI, LLC, from distributors in Puerto Rico, but those purchases were not for application of the methyl bromide in Puerto Rico. Please note that Responses and Objections are not submitted on behalf of Prestige Pest Management, Inc., and Terminix International Company, L.P. expects that Prestige Pest Management, Inc. will respond on its own behalf.